

DEVOTO

Vineyards

PREMIUM NORTH COAST WINEGRAPES SINCE 1972

August 15, 2005

COMMENT 52

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P. O. Box 14412
Washington, DC 20044-4412

Re: Notice No. 49

Gentlemen and Ladies:

I wish to protest the proposal to lower the vintage dating requirement to 85% for certain wines. This move has the potential to lower net prices for grapes by allowing wineries to blend in a greater portion from high production, low price year, with the attendant lower overall prices for grapes. In addition, it could lower the overall quality of American wines.

In addition to the probable negative economic impact on growers, our own consumers could recognize this as a lowering of wine quality standards. We currently have a requirement of 85% varietal quantity for AVA designated wines and only 75% for those with geographical designation. The proposed lowering of vintage dating to 85% for geographical designation will further confuse consumers and lower their trust in our wines.

The changes proposed by Notice No. 49 will be of benefit to only a few large wineries. It is also inconsistent with the ATT statement of mission "...to protect the revenue, protect the consumer and promote voluntary compliance."

Please reject the proposed change to wine labeling regulations.

Sincerely,



R. Stephen Devoto
Managing Member